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December 29, 2021

VIA ECF

Honorable Margo K. Brodie
United States District Court
Eastern District New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *State Farm Mutual Automobile Ins. Co., et al. v. Metro Pain Specialists P.C., et al.*
Docket No.: 21-CV-05523; File No.: L3171

Dear Judge Brodie:

This firm represents Defendants Reuven Alon (a/k/a Rob Alon), Columbus Imaging Center LLC, Medaid Radiology LLC, Yan Moshe (a/k/a Yan Leviev), Hackensack Specialty ASC LLC (f/k/a Dynamic Surgery Center LLC), and Integrated Specialty ASC LLC (f/k/a HealthPlus Surgery Center LLC) (collectively “Responding Defendants”) in the above referenced matter. Please accept this correspondence in response to Dr. Shapiro, Metro Pain, and Tri-Borough NY Medical’s (“Shapiro Defendants”) request for an extension of time to oppose Plaintiff’s motion for Preliminary Injunction and Stay.

Please be advised that although Plaintiffs have consented to the adjournment of the date for all Defendants to respond to the motion, such consent came with certain conditions. Moving Defendants did not seek the requested extension, do not consent to the conditions set forth by Plaintiffs, and do not join the Shapiro Defendants’ motion for an extension of time.

Thank you for your attention to this matter.

Respectfully yours,
THE RUSSELL FRIEDMAN LAW GROUP, LLP

By: /s/Jennifer B. Strong
Jennifer B. Strong

JBS/dm

cc: All counsel, via ECF